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Attorneys for Defendant/Counterclaimant/Third-Party Plaintiff

9440 Fairview Avenue LLC, and Defendants Timothy Murray,

Joseph Sanzari Inc. and North Bergen Asphalt LLC

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Attorneys for Defendant Joseph Sanzari, individually

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

AMA REALTY LLC,

Plaintiff/Counterclaim
Defendant,

v.

9440 FAIRVIEW AVENUE, LLC, JOSEPH
SANZARI, TIMOTHY MURRAY, JOSEPH
M. SANZARI INC., NORTH BERGEN
ASPHALT LLC, and TILCON NEW YORK,
INC.

Defendants/Counterclaimant/
Third-Party Plaintiff

v.

MILLENNIUM RESOURCES RECOVERY,
LTD, PERFECT BODY & FENDERS CO.,
INC., and JOHN DOES 1-5.

Third-Party Defendants.

CIVIL ACTION NO.: 02:13-cv-00457

FILED ELECTRONICALLY

**NOTICE OF MOTION *IN LIMINE* TO
PRECLUDE THE OPINIONS OF
ANTHONY J. RINALDI, MAI**

TO: Paul Batista, Esq.
26 Broadway – Suite 1900
New York, NY 10004

Michael Farhi, Esq.
Kates Nussman Rapone Ellis & Farhi, LLP
190 Moore Street, Room 306
Hackensack, NJ 07601
Attorneys for Plaintiff, AMA Realty LLC

PLEASE TAKE NOTICE that on September 26, 2019, at 10:30 a.m. or as soon thereafter as counsel may be heard, Defendant/Counterclaimant/Third-Party Plaintiff 9440 Fairview Avenue LLC, and Defendants Joseph M. Sanzari, Inc., North Bergen Asphalt LLC, and Timothy Murray, individually, by their undersigned counsel, Connell Foley LLP, and Defendant Joseph Sanzari, individually, by his counsel Krovatin Klingeman LLC (collectively “Defendants”), shall move before the Honorable John M. Vazquez, U.S.D.J., at the Martin Luther King Federal Building & U.S. Courthouse, Newark, New Jersey, for entry of an Order precluding the opinions of Anthony J. Rinaldi, MAI.

PLEASE TAKE FURTHER NOTICE that in support of this motion, Defendants will rely upon the Brief and the Certification of Timothy E. Corrison and Exhibits thereto, and any additional submissions made hereafter; and

PLEASE TAKE FURTHER NOTICE that a proposed form of Order has been submitted herewith pursuant to the Rules of this Court; and

PLEASE TAKE FURTHER NOTICE that oral argument is requested on this matter.

CONNELL FOLEY LLP

By: /s/ Timothy E. Corriston, Esq.
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*Attorneys for Defendant/Counterclaimant 9440
Fairview Avenue LLC, and Defendants Joseph M.
Sanzari, Inc., North Bergen Asphalt LLC, Tilcon
New York Inc., and Timothy Murray, individually*

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individually*

Dated: July 15, 2019